

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

JACOB ERIC JONES,

Defendants.

NO. CR18-271 RSL

(PROPOSED)

PROTECTIVE ORDER

This matter having come before the Court on a Stipulated Motion for Entry of a
Discovery Protective Order, the Court hereby enters the following:

DISCOVERY PROTECTIVE ORDER

A. Definitions

As used in this Order, the term "Protected Information" means any date of birth,
Social Security number, driver's license number, bank account number, credit card
number, personal identification number, address, telephone number, name and/or location
of employment, criminal history record, background check, immigration history/status,
and/or any other similar information or number implicating a privacy interest and
belonging to an individual, business, partnership, or corporation.

1 “Protected Information” also includes the name of any victim of the charged
2 offenses or any non-defendant witness.

3 As used in this Order, the term “Protected Material” means any document or other
4 record containing or reflecting Protected Information.

5 **B. Procedures**

6 Possession of Protected Information and/or Protected Material is hereby limited to
7 the attorneys of record in the above captioned case and their investigators and agents. The
8 attorneys of record and their investigators and agents may review Protected Information
9 and/or Protected Material with the defendant. The defendant may visually inspect and
10 review such documents but shall not be allowed to possess Protected Information (such
11 as un-redacted copies of Protected Material or notes, copies, or photographs of such
12 Protected Material containing Protected Information). The defendant may possess
13 documents from which all Protected Information has been redacted.

14 The attorneys of record and their investigators and agents may review or discuss
15 the contents of documents containing Protected Material with any prospective witness, as
16 long as the attorneys of record and investigators and agents do not share the un-redacted
17 documents, or share any Protected Information of victims or witnesses, with any
18 prospective witness.

19 If any Protected Information or Protected Material is filed in court or otherwise
20 disseminated as part of litigation, the parties agree to redact such information prior to
21 filing; unless, based on a party’s application prior to filing, the Court finds that an un-
22 redacted filing is necessary and appropriate.

23 For redactions, numbers that constitute Protected Information shall be redacted to
24 the last 2-4 digits and names shall be redacted to initials, or otherwise as needed to
25 comply with applicable federal and local rules.

26 The attorneys of record and their investigators and agents shall keep any Protected
27 Material secured whenever the Protected Material is not being used in furtherance of their
28 work in the above-captioned case.

1 All documents containing Protected Material shall be returned to the
2 United States, or destroyed, once all charges are resolved by dismissal or by final
3 conviction.

4 The parties agree that this Protective Order may be modified, as necessary, by
5 filing with the Court a Stipulated Order Modifying the Protective Order, or by other order
6 of the Court.

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8 DATED this 4th day of December, 2018.

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12 ROBERT S. LASNIK
13 United States District Court Judge
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17 Presented by:

18
19 /s/ Benjamin T. Diggs

20 BENJAMIN T. DIGGS

21 Special Assistant United States Attorney
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